

UNITED STATES DISTRICT COURT
for the
Southern District of Texas

JSH-SDTX
FILED

APR - 3 2015

United States of America)
v.)
Dagoberto G. SERNA) Case No. 5:15mj 396-1
Laredo, Texas)

Defendant)

David J. Bradley, Clerk
Laredo Division

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date of 04/02/2015 in the county of WEBB in the SOUTHERN District of TEXAS, the defendant violated Title 18 U. S. C. § 2422 (b), an offense described as follows:

using a facility and means of interstate commerce, did knowingly persuade, induce, entice and coerce an individual who had not attained the age of eighteen years, to engage in sexual activity under such circumstances as would constitute a criminal offense, and attempted to do so.

This criminal complaint is based on these facts:

SEE ATTACHMENT "A"

Continued on the attached sheet.



Complainant's signature

Marcos Valdez, Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 04/03/2015



Judge's signature

City and state: Laredo, Texas

J. Scott Hacker, U.S. Magistrate

Printed name and title

ATTACHMENT A

I, Marcos Valdez, a Special Agent of United States Immigration and Customs Enforcement, Homeland Security Investigations, have knowledge of the following facts:

1. Beginning on or about March 09, 2015, through investigative activity Homeland Security Investigations (HSI) agents discovered Dagoberto G. SERNA, a U.S. citizen, was attempting to coerce and entice a fourteen (14) year old female to engage in illegal sexual activity.
2. From March 09, 2015 through April 2, 2015, SERNA utilized the internet and an e-mail account to provide an image of a penis and establish a meeting place to engage in illegal sexual activity with a minor.
3. On April 2, 2015, at approximately 10:30 am, HSI agents with the assistance of Laredo Police Department arrested SERNA at a local business in Laredo, TX, and transported to the office of Homeland Security Investigations, Laredo, for an interview.
4. At the office of Homeland Security Investigations, Laredo, SERNA was advised of his Miranda Rights in the Spanish language. SERNA confessed to attempting to coerce and entice a fourteen year old female to engage in illegal sexual activity and to providing an image of a penis to a fourteen year old female.